

**BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2003-327-C**

In Re: Continued Availability of Unbundled)
High Capacity Loops at Certain Locations and)
Unbundled High Capacity Transport on Certain)
Routes Pursuant to the Federal Communication)
Commission's Triennial Review Order)
_____)

**AT&T COMMUNICATIONS OF THE SOUTHERN STATES, LLC'S
RESPONSE TO BELL SOUTH TELECOMMUNICATIONS, INC.'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-5)**

AT&T Communications of the Southern States, LLC, (hereinafter "AT&T") pursuant to Rules 26 and 34 of the South Carolina Rules of Civil Procedure, and Rules 103-853 and 103-854 of the Rules and Regulations of the Public Service Commission of South Carolina (hereinafter "Commission"), hereby submits the following Responses to BellSouth Telecommunications, Inc.'s (hereinafter "BellSouth") First Request For Production of Documents (Nos. 1-5), served on December 9, 2003. Should additional responsive information be discovered at any time prior to hearing, AT&T reserves the right to supplement, revise, and/or modify these Responses.

REQUEST: BellSouth First Request for Production of Documents

DATED: December 8, 2003

POD 1: Produce any maps and/or diagrams that illustrate the most current information available for the physical location of your high capacity transport and/or loop facilities within the Southeastern states.

Response: AT&T specifically objects to this request to the extent that it is overly broad, unduly burdensome, irrelevant, oppressive and not reasonably calculated to lead to the discovery of admissible evidence pursuant to the Procedural Orders.

Subject to the foregoing, and without waiving any objection, all identified documents have been attached to each specific interrogatory or attached herein.

REQUEST: BellSouth First Request for Production of Documents

DATED: December 08, 2003

POD 2: Produce any documents identified in your responses to
BellSouth's First Set of Interrogatories in this docket.

Response: All documents identified in response to BellSouth's First Set of
Interrogatories are attached to AT&T's Responses to BellSouth's
Interrogatories.

REQUEST: BellSouth First Request for Production of Documents

DATED: December 8, 2003

POD 3: Produce any business case from 2000 to present in your possession, custody, or control that evaluates, discusses, analyzes or otherwise refers or relates to your actual or planned deployment of high capacity transport and/or loop facilities within the Southeastern states.

Objection: In the Triennial Review Order, the FCC establishes the factors that a state Commission should consider in any analysis of a Loop and Transport potential deployment case.

“[T]he state commission must consider various factors affecting the ability to economically deploy These factors include: evidence of alternative loop deployment at that location; local engineering costs of building and utilizing transmission facilities; the cost of underground or aerial laying of fiber or copper; the cost of equipment needed for transmission; installation and other necessary costs involved in setting up service; local topography such as hills and rivers; availability of reasonable access to rights-of-way; building access restrictions/costs; availability/feasibility of similar quality/reliability alternative transmission technologies at that particular location.” (TRO, Paragraphs 335 and 410)

Given this directive from the FCC, information concerning the wire centers in the Southeastern states in which AT&T is “currently in the process of deploying or plans to deploy transport facilities and/or loop facilities beginning October 1, 2003 through December 31, 2004” is neither relevant to a potential deployment analysis nor likely to lead to the discovery of admissible evidence. By way of further response, this Interrogatory is asking for AT&T's future capital planning forecast, the particulars of

which, as BellSouth is well aware from its own planning and forecasting processes, likely will change quarter over quarter as circumstances change. In any event, AT&T's future capital planning forecast is not relevant and to the extent AT&T implements any such plan, the results (but not any plans) might be relevant in any future "actual deployment" case that BellSouth is permitted to request under the TRO. AT&T does not intend to provide this information to BellSouth absent a Motion to Compel and Order of a Commission requiring AT&T to do so.

REQUEST: BellSouth First Request for Production of Documents

DATED: December 8, 2003

POD 4: Produce any business case from 2000 to present in your possession, custody, or control that evaluates, discusses, analyzes or otherwise refers or relates to your obtaining high capacity transport and/or loop facilities from other persons.

Objection: AT&T incorporates by reference its objection to POD No. 3 as if fully set forth herein.

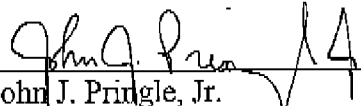
REQUEST: BellSouth First Request for Production of Documents

DATED: December 8, 2003

POD 5: Produce all documents from 2000 to present referring or relating to how you determine whether or not to deploy high capacity transport and/or loop facilities.

Objection: See AT&T's objection to Interrogatory Nos. 3 and 4, *supra*.

Respectfully submitted, this the 8th day of January, 2004.




John J. Pringle, Jr.
Ellis, Lawhorne & Sims, P.A.
1501 Main Street
5th Floor
Columbia, SC 29201
(803)779-0066 (Telephone)

Attorney for AT&T Communications of the Southern States, LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and correct public redacted copy of the foregoing AT&T Responses to BellSouth's First Set of Interrogatories and Request for Production of Documents was posted to the public website, <http://www.compsouth.net>, and that notice of this posting was sent by electronic mail to all parties of record this 8th day of January, 2004. Additionally, a copy of the confidential version of the foregoing was sent by U.S. mail, first class postage prepaid, to all parties who signed the Protective Agreement.


Margaret A. Plasman